

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

| | |
|--|---|
| In Re: Jack A. Glasser, Debtor. | Bankruptcy No.: 22-30244 Chapter 7 |
| Messiahic, Inc. d/b/a PayJunction, vs. Plaintiff, Jack A. Glasser, Defendant. | Adversary No. 23-07006 |

NOTICE AND MOTION FOR WITNESSES TO APPEAR BY VIDEO CONFERENCE

[¶1] Plaintiff, Messiahic, Inc. d/b/a PayJunction (“PayJunction”), by and through its undersigned counsel, pursuant to District of North Dakota Bankruptcy Local Rule 5001-2, hereby move for certain witnesses to appear by video conference for the trial scheduled on Tuesday, June 4, 2024, starting at 9:30 A.M. CST through Friday, June 7, 2024, at 5:00 P.M. CST. Plaintiff respectfully requests the Court grant its Motion to call certain witnesses by video conference.

[¶2] For judicial efficiency, this Motion will contain the names and locations of all witnesses who may appear by video conference.

- a. Sierra Hall, 2300 46th Ave SE Apartment #317, Mandan, ND 58554.
- b. Steve Zottnick, 401 N. 4th Street, Bismarck, ND 58501.
- c. Chad Johnson, 603 Parker Ranch Road, Bismarck, ND 58503.
- d. Stephanie Thorp, 840 43rd Ave NE, Suite 100, Bismarck, ND 58503.
- e. Toby Kommer, 5195 45th Street South, Fargo, ND 58104, who will be in Arizona at the time of the trial for work.

- f. Brodie Cundy, 1001 Second Street West, Eveleth, MN 55734.
- g. McLaurnyn Alexander, 800 Custer Dr. Mandan, ND 58554.
- h. Crystal Kraft, 1720 Burlington Drive, Suite C, Bismarck, ND 58504.
- i. Angelina Campanale, 507 East St, Bottineau, ND 58318.
- j. Any other witnesses identified on Plaintiff's Witness List.

[¶3] Because of the potential savings in time and expenses for each individual witness, the Court should grant PayJunction's motion for the witnesses to appear by video conferences.

[¶4] All witnesses will be served with a copy of this Motion.

[¶5] **NOTICE IS HEREBY GIVEN** that PayJunction has filed a motion for witnesses to appear by video conference, pursuant to District of North Dakota Bankruptcy Local Rule 5001-2.

[¶6] **NOTICE IS FURTHER GIVEN** that the Court may rule on the motion for witnesses to appear by video conference without a hearing or an opportunity to respond, pursuant to District of North Dakota Bankruptcy Local Rules 2002-1(E) and 7007-1(C).

[¶7] **WHEREFORE**, the Plaintiff respectfully requests the Court grant its Motion for witnesses to appear by video conference or other remote means.

Dated: May 27, 2024

/s/Berly D. Nelson

Berly D. Nelson (ND #05903)
SERKLAND LAW FIRM
10 Roberts Street North
Fargo, ND 58102-4982
Phone: 701.232.8957
bnelson@serklandlaw.com

/s/ Robert F. Elgidely

Robert F. Elgidely (pro hac vice)
Fox Rothschild LLP
2 South Biscayne Blvd., Ste. 2750
Miami, FL 33131
Phone: (305) 442-6543
RElgidely@foxrothschild.com

*Attorneys For Plaintiff
Messiahic, Inc. d/b/a PayJunction*